

Message

From: Hall, Casey [Casey.Hall@meritenergy.com]
Sent: 4/4/2022 3:04:26 PM
To: Wiser, Nathan [Wiser.Nathan@epa.gov]; Valliquette, Arlene [Arlene.Valliquette@meritenergy.com]
CC: Wang, Gary [wang.gary@epa.gov]; Brown, Christopher [Brown.Christopher.T@epa.gov]; Manning, Jason [Jason.Manning@meritenergy.com]; Kittinger, Eric [Eric.Kittinger@meritenergy.com]
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field
Attachments: Shoshone 65-68 PA Procedure Revised.pdf; Shoshone 65-77A PA Procedure Revised.pdf

Nathan-

Attached are the two revised Pas for the Shoshone 65-68 and the Shoshone 65-77A (balanced plug). I left the already amended "WOC for 24 hours" in both.

Let me know if there is anything else.

Thanks!

Casey Hall

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From: Wiser, Nathan <Wiser.Nathan@epa.gov>
Sent: Friday, April 1, 2022 9:42 AM
To: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>; Manning, Jason <Jason.Manning@meritenergy.com>; Hall, Casey <Casey.Hall@meritenergy.com>; Kittinger, Eric <Eric.Kittinger@meritenergy.com>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

EXTERNAL EMAIL

Hello Arlene, et al,

My EPA colleague has pointed out to me that the statements of basis accompanying the two EPA permits referenced below identify that the depth to the base of the underground source of drinking water (USDW) are located such that the current revised P&A plans require additional some cement coverage inside the 5-1/2" production casing in each well. Please submit newly revised P&A plans for these two wells to account for this.

1. Shoshone 65-68 Well, EPA Permit WY20837-02175:

USDW depth: Dinwoody Fm 653'-879'. Needed - a 100' plug inside the 5-1/2" csg to cover the USDW base (829'-929')

Recommended: at Step 5 of the proposed P&A plan, add an 50 additional sx of 1.16 yield cement to the top of the CICR, to bring the top of this cement plug to at least 829'. This would mean at Step 4, after pumping cement through the CICR, 75 sx (not 25 sx) would be placed atop the CICR.

2. Shoshone 65-77A Well, EPA Permit WY20521-02119:

USDW depth: Dinwoody Fm 254'-418'. Needed - a 100' plug inside the 5-1/2" csg to cover the USDW base (368'-468')

Recommended: either (1) at Step 4 of the proposed P&A plan, add 152 additional sx of 1.16 yield cement to bring the top of this cement plug to at least 368', or (2) after Step 4 move up-hole and spot an additional plug from 468' to 368' (approx. 12 sx of 1.16 yield cement). If the second option is used Merit will have to WOC and tag the added plug if it is balanced but will not have to do so if the 100' cement plug is placed atop a mechanical plug.

Nathan Wiser

Environmental Scientist

(he/him/his)

U.S. Environmental Protection Agency

Enforcement and Compliance Assurance Division

SDWA Enforcement Section

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Try this link for EPA Region 8 UIC information: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>

Sent: Tuesday, March 29, 2022 1:56 PM

To: Wiser, Nathan <Wiser.Nathan@epa.gov>

Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>; Manning, Jason <Jason.Manning@meritenergy.com>; Hall, Casey <Casey.Hall@meritenergy.com>; Kittinger, Eric <Eric.Kittinger@meritenergy.com>

Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

Good afternoon Nathan,

This email is to follow up on our telephone conversation from yesterday regarding the P&A procedures for the 7 injection wells at Circle Ridge. Attached you will find the revised procedures removing the 24- hour waiting period after cementing through the cement retainer on each well. Also, revised procedures for the two wells (Shoshone 65-41 and Shoshone 65-20) which you required in your previous email are included in the revisions attached. Please let me know if you have any questions regarding the revised procedures or if you need additional information to continue the review and approval for the plugging and abandonment of the 7 wells.

Thanks again for your time yesterday. Regards,

Arlene

Arlene Valliquette, Regulatory Manager

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(972) 628-1558

From: Valliquette, Arlene
Sent: Thursday, March 10, 2022 4:59 PM
To: Wiser, Nathan <Wiser.Nathan@epa.gov>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

Good afternoon Nathan,

Attached are the revised P&A procedures for the two wells you requested, Shoshone 65-20 and Shoshone 65-41. Let me know if you need anything additional to finalize your review and approval of Merit's plugging procedures. Thanks,

Arlene

Arlene Valliquette, Regulatory Manager
Merit Energy Company, LLC
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(972) 628-1558

From: Valliquette, Arlene
Sent: Friday, February 4, 2022 9:28 AM
To: Wiser, Nathan <Wiser.Nathan@epa.gov>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

Good Morning Nathan,

I passed your redline for the two P&A procedures to Merit's engineer for review. I hope to have those revisions back from him next week. In the meantime, I wanted to provide some information regarding the MITs on the wells:

Following the termination of the Circle Ridge Lease, effective June 1, 2021, Merit submitted plugging sundries to the BLM and BIA in June of 2021 for the following wells that the Northern Arapaho and Eastern Shoshone Tribes (collectively, the "Tribes") elected not to assume:

Permit No.	API No.	Well Name
WY20837-02175	49-013-21497	Shoshone 65-68 Tensleep
WY20521-02119	49-013-21637	Shoshone 65-77
Rule Authorization No.	API No.	Well Name
WY20000-02169	49-013-06833	Shoshone 65-20
WY20000-02170	49-013-06830	Shoshone 65-25
WY20000-02177	49-013-06845	Shoshone 65-38
WY20000-02179	49-013-06839	Shoshone 65-41
WY20000-02182	49-013-06851	Shoshone 65-42

Although Merit is still waiting for approval from the BLM and BIA regarding its sundry requests, Merit has submitted its proposed plugging and abandonment plans to ECAD for review. Since Merit intends to permanently plug and abandon the above referenced wells, MITs were not conducted. Merit is prepared to move forward with the P&A of these wells as soon as it is authorized to do so. Please let us know if you require any additional information on the above wells.

After assuming operations of the Circle Ridge Field on June 1, 2021, the Tribes amended the list of wells they were electing to assume to add the Shoshone 65-32 (API 49-013-06820/Permit No. WY20711-03776) and Shoshone 66-46 (API 49-01-306775/Rule Authorization No. WY20000-03089). The EPA did not approve the original transfer of operational control for these two wells due to the Tribes failure to provide the necessary financial assurance. In light of the amended election by the Tribes to assume these two wells, Merit presumes that the Tribes are working with the EPA to secure the necessary financial assurance. If there is anything that you need from Merit to facilitate this transfer, please let us know.

I'll send the P&A revisions for the two wells as soon as I get them from the engineer. Thanks and regards,

Arlene

Arlene Valliquette, Regulatory Manager
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(972) 628-1558

From: Wiser, Nathan <WiserNathan@epa.gov>
Sent: Monday, January 31, 2022 3:40 PM
To: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

EXTERNAL EMAIL

Thank you Arlene for these clearer wellbore diagrams.

1. I attach a spreadsheet with comments on the 1/27/2022 P&A plans for these seven Circle Ridge field Class II injection wells. See bullets below for highlights of the spreadsheet.
 - There are **two wells** for which the P&A plans should be amended, identified with red font under the EPA Comments column.
 - There is also a tab in the attached spreadsheet showing the nine Circle Ridge Class II injection wells remaining under Merit Energy's name at present, and how many of them (7) **are currently overdue** for either a mechanical integrity test (active well) or a non-endangerment demonstration (temporarily abandoned well).
2. In your 1/12/2022 email to us you also asked how CY2021 annual reports should be submitted to EPA for these nine Circle Ridge injection wells. Given that Merit remains the operator (or permittee) of record for these remaining nine injection wells, it is Merit's duty to submit the 2021 annual reports, by 2/15/2022. We recognize that Merit may not have physically operated these wells after the lease was non-renewed. As such, you may or may not have knowledge of how/whether these nine wells were operated and monitored for all 12 months of CY2021. If, for these wells, you can obtain the appropriate recorded values of injection volume, injection tubing

pressure, and tubing/casing annulus pressure for all 12 months of 2021, please submit that. In the absence of all such data, please submit what you can.

Thanks.

Nathan Wiser
Environmental Scientist
(he/him/his)
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SDWA Enforcement Section

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Try this link for EPA Region 8 UIC information: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Sent: Friday, January 28, 2022 1:41 PM
To: Wiser, Nathan <Wiser.Nathan@epa.gov>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

Hi Nathan,

I was able to get cleaner copies from the engineer. Please see attached. Let me know if you need anything else. Regards,

Arlene

Arlene Valliquette, Regulatory Manager
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From: Wiser, Nathan <Wiser.Nathan@epa.gov>
Sent: Friday, January 28, 2022 10:51 AM
To: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>
Subject: RE: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

EXTERNAL EMAIL

Hello Arlene,

Thank you for sending these P&A plans. If possible, can you **please re-send the wellbore diagrams** for each of these seven wells below so we can more clearly read well components, their depths, and activities undertaken. These details may be important when it comes to providing comments on the proposed P&A procedures. The other content you emailed yesterday is quite legible.

Thanks.

	WELL NAME	EPA ID/Permit No.
1.	Shoshone 65-20	WY20000-02169
2.	Shoshone 65-25	WY20000-02170
3.	Shoshone 65-38	WY20000-02177
4.	Shoshone 65-41	WY20000-02179
5.	Shoshone 65-42	WY20000-02182
6.	Shoshone 65-28	WY20710-02172
7.	Shoshone 65-77A	WY20521-02119

Nathan Wiser

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Try this link for EPA Region 8 UIC information: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>

Sent: Thursday, January 27, 2022 2:08 PM

To: Wiser, Nathan <Wiser.Nathan@epa.gov>

Cc: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>

Subject: Merit Energy Company P&A Plans for 7 Injection Wells - Circle Ridge Field

Dear Mr. Wiser,

Attached please find Merit Energy Company's plans for the plugging and abandonment of seven injection wells located within the Circle Ridge Field in Fremont County, Wyoming. I understand many people are working remotely and I wanted to get these submitted for review and approval as soon as possible. In scanning the documents it appears some of the information may be difficult to read. Please let me know if that is the case on your end and I'll try to get you better copies.

Once Merit receives EPA approval of the plugging plans, how long is that approval valid?

If you have any questions or require additional information, please contact me either via email or by telephone at the number below.

Sincerely,

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